

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
(Charlotte Division)

In re:)	Chapter 7
)	
Applied Machinery Rentals, LLC)	Case No. 23-30461
)	
Debtor.)	

EX PARTE MOTION TO CONDUCT RULE 2004 DISCOVERY

Cole Hayes, Trustee for the estate of the above captioned Chapter 7 bankruptcy (the “Trustee”), requests the Court enter an order permitting the Trustee to serve document subpoenas on and to take the deposition of Jessica King (“King”). In support thereof, the Trustee respectfully asserts the following:

1. King is a former officer and insider of the Debtor. The Trustee believes King has firsthand knowledge of the Debtor’s business operations and alleged fraud.
2. Given King’s role with the Debtor, cause exists for the Trustee to serve document subpoenas on and to take King’s deposition in order to better understand the Debtor’s operations and potential targets of litigation claims.
3. The Trustee has been in contact with King’s attorney to begin the process of scheduling her deposition at a mutually agreeable time.

WHEREFORE, the Trustee requests that the Court enter an order pursuant to Bankruptcy Rule 2004 authorizing the relief requested herein, and for such other relief as the Court deems just and proper.

Dated: Charlotte, North Carolina
September 27, 2023

/s/ Cole Hayes
Cole Hayes (Bar No. 44443)
601 S. Kings Drive
Suite F PMB #411
Charlotte, NC 28204
704-490-4247
Trustee and attorney for the Trustee